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ATOCHEM NORTH AMERICA, INC.
17168 West Jefferson Avenue
Riverview, Michigan 48192-4270

Tel: (313) 285-9200

March 5, 1991

Data Entry Unit
Surface Water Quality Division
Michigan Department of Natural Resources
P. O. Box 30028
Lansing, Michigan 48909

Re: Atochem North America - Riverview Plant
NPDES Permit No. MI 0002381

The monthly Operating Report and the Discharge Monitoring Report for February are enclosed. Please note the following incident of apparent **non-compliance** which has been reported to the Surface Water Quality Division.

Outfall 001

Permit Limitation for pH: **6.0 to 10.5 Daily Maximum Range**

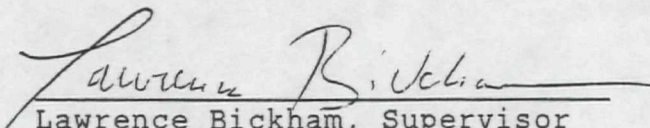
Indicated value on 2/1: **4.2**

The apparent incident was caused by **methane sulfonic acid overflowing 46550 Tank and entering the plant sewer after a high tank level alarm failed due to improper calibration.** The high level alarm was recalibrated and checked. A tank overflow line was routed to a secondary containment area.

If there are any questions, please contact me.

Very truly yours,

ATOCHEM NORTH AMERICA


Lawrence Bickham, Supervisor
Environmental Affairs
Riverview Plant

LB:lm

Enc.



MAR 11 1991

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Riverview, Michigan 48192-4270

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SURFACE WATER QUALITY DIVISION
SOUTHEAST MICHIGAN DISTRICT OFFICE

WATER QUALITY
DIVISION

FEB 7 1991

RECEIVED

February 5, 1991

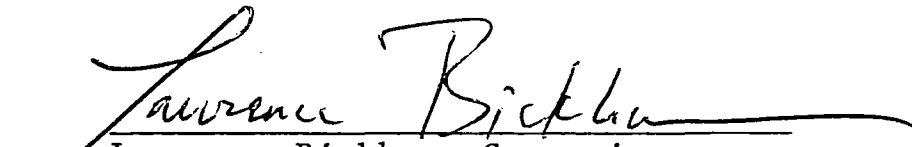
Department of Natural Resources
Water Quality Division
28
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Michigan 48909

the completed Spill report form and NPDES Incident Report
which occurred February 2, 1991 at our Riverview, Michigan

revised NPDES Incident Report, for the previously reported
on January 24, 1991, is attached. The cause and action
were modified based on further investigation of the in-

Very truly yours,

ATOCHEM NORTH AMERICA, INC.


Lawrence Bickham, Supervisor
Environmental Affairs

Jin Yoon
Water Quality Division
Natural Resources
Seven Mile Road
Michigan 48152

D. Zugger, Chief
Water Quality Division
Department of Natural Resources
30028
Michigan 48909

Ms. Hae-Jin Yoon
Surface Water Quality Division
Department of Natural Resources
38980 Seven Mile Road
Livonia, Michigan 48152

Permit No. MI 0002381
Order of Abatement No. 1994

Incident(s) February 2, 1991 Outfall No. 001

Characteristic(s) pH

Parameter(s) 6.0 to 10.5 100% of the time

Value pH = 4.3

gallons of methane sulfonic acid overflowed from 46550 tank
vent line which discharged to the ground outside of the process
the high level alarm for the tank did not operate due to improper
during the last maintenance check.

60 minutes

Action: Shutdown Process. Spread soda ash on the spill to the
neutralize the material and limit the acid in the sewer to 10 - 20
neutralized acid was put into drums for offsite disposal.

Prevent Recurrence: Install liquid leg from vent line into a

containment area. Recalibrate level alarm and adjust maintenance

REPORT OF OIL, SALT OR POLLUTING MATERIAL LOSSES

Pursuant to the provisions of Act 245 of the Public Acts of Michigan 1929 as amended, regulations have been issued which require that all owners, managers or operators of vessels, oil storage or on land facilities shall notify the Water Resources Commission or his authorized representative of oil, salt and polluting material losses. This notification shall be made promptly by telephone or telegraph, giving briefly the particulars, and by mail, giving a detailed account of event, and conditions.

Date February 5, 1991	Company Name ATOCHEM NORTH AMERICA, INC.
Location of Loss (Be Specific) Outside the West Wall of Process 46	

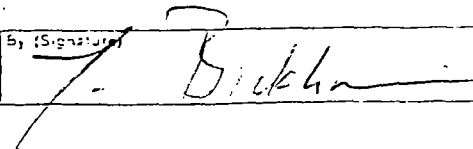
Material Lost Methane Sulfonic Acid	Amount 50 gallons	Name of surface water involved Outfall 001- Monguagon Creek
Date Loss was Discovered February 2, 1991	Time of Discovery 3:30 a.m.	

Name of Department of Natural Resources Representative Contacted P A.S.	
Telephone or Telegraphed by Whom Mr. Mike Harris	Time 4:45 a.m.

Use of Loss (Include Type of Equipment and Other Details)
Methane Sulfonic Acid overflowed from 46550 tank through a vent line which discharged to the ground outside of the process building. The high level alarm for the tank did not operate due to improper calibration during the last maintenance check.

Nature of Loss (Include Complete Description of Damage)
The material fell on the ground and about 10 to 20 gallons entered the sewer. The pH of the Outfall dropped to 4.3 and was outside the 6.5 to 9.0 range for 60 minutes. The remaining acid on the ground was neutralized with soda ash and put into drums for off site disposal.

Additional Comments (Include Method of Control, Plans for Prevention of Recurrence, etc.)
A liquid leg from the 46550 tank vent has been installed to discharge into a secondary containment area. The tank level indicator was checked and the level alarm was re-calibrated. Maintenance records were changed to insure proper calibration in the future.

Company Name ATOCHEM NORTH AMERICA, INC.	By (Signature) 
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Return this form to:

Department of Natural Resources
Bureau of Water Management
8th Floor Stevens T. Mason Bldg.
Lansing, Michigan 48926

24 hr. Emergency Notification Number
517 — 373-7650